

EXHIBIT 1

In the Matter Of:

SATANIC TEMPLE vs NEWSWEEK DIGITAL

1:22-cv-01343-MKV

LUCIEN GREAVES

November 06, 2023



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Square. Everything was within walking distance.

Really nice spot.

Q. Yeah. That's the area I lived in as well, although I was there much earlier than you were.

A. It's a lot different now.

Q. I'm sure.

A. Just since COVID.

Q. Can you give me also a brief summary of your career background after you graduated from college?

A. I worked for a publishing house for a bit and then started working with The Satanic Temple.

Q. What was the publishing house?

A. It was Hachette.

Q. How long did you work there approximately?

A. Five years.

Q. And was that in Boston?

A. Yes.

Q. So tell me about the founding of The Satanic Temple. Was that in 2017?

A. No. That was 2013/2014, the founding

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of The Satanic Temple.

Q. Were you involved in the founding?

A. Yes.

Q. So that occurred during the time that you were employed at Hachette. Is that right?

A. Yeah. It happened not long before I quit there.

Q. Describe generally, if you will, how the founding came about?

A. Well, originally I had no intention of having my face to this. I didn't have this as my long-term plan, but my founding partner in this, Malcolm Jarry, you know, had this idea of working on a documentary that would show an alternative religion fighting for rights, and knowing of my affinity with Satanism, I really wanted to consult on this and make sure that everything was accurately represented, and at the beginning we didn't necessarily intend for it to become an organization. We thought we would do a few things, and other people who self-identify as Satanists would start doing the same things, and they kind of rallied behind us instead after that, and things came together into an

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payments and subscriptions and stuff like that, so I'm happy to not touch it and have somebody else volunteering to do that.

Q. You said for three months this year you took a salary from The Satanic Temple. Prior to that, had you also been receiving a salary?

A. No, not a salary. Nothing with regularity.

Q. What's your current position now in the Satanic Temple?

A. Spokesperson and co-founder, and I really don't have any other titles to go along with that, so the description of duties, you know, generally does go beyond spokesperson and gets into things of an executive decision nature. I just don't have, you know, beyond co-founder, I don't really have a title for that.

Q. So tell me about your duties and responsibilities. What do you do for The Satanic Temple presently?

A. I mean in theory, you know, I write a lot of the copy. I do the spokespersoning. You know, I put forward the message. I do the interviews and that type of thing. In reality, I

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certain way.

So we really have intentionally kind of isolated ourselves from elements of that while trying to make sure that it is managed, and to that end we have people we feel, you know, act as good reporting avenues to others and, you know, the appropriate committees to adjudicate these types of things based on preexisting HR standards that were lifted for the benefit of our organization.

We looked up, because we're pretty grass roots, so we have to kind of work with, you know, what we can open-source sometimes and that kind of thing.

Q. Do you have an HR department?

A. Yeah. We call them our Suryan Council, and they're the ones who directly take HR-style complaints.

Q. And is there an HR handbook that they work off of?

A. One of the people who founded our Suryan Council worked professionally for some large corporation in HR and was essentially mirroring those standards within our

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professor named Lucien Greaves or something like that.

A. No. Wouldn't he be pissed now?

Q. Tell me about the public-facing work that you do as a spokesperson and for TST.

A. Yeah. Well, sometimes we get called by news media or podcasters, and they want to know about our campaigns, some of the things we're up to and why, and I'm generally the guy who will talk to them about those things up to the point of, you know, television broadcasts and speaking engagements.

Q. Do you also actively seek out those opportunities?

A. Well, we put out press releases. Yeah. That's about it. We put out press releases, and then people reach out to us or they don't, and sometimes people just reach out to us anyway.

Q. Is there a regularity to the press releases?

A. No. It's really dependent on what's going on. We never say, well, it's time for a press release just to put out a press release.

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The press releases are always attached to an activity, one of our campaigns, an issue, that kind of thing, and our interviews are supposed to be that way too. That's kind of a standard we put on the congregations that, you know, if you're giving media, it need to be issues-based. It can't just be, hey, look at us kind of thing. There has to be a purpose behind it. You know, that social capital attached to being interested in you depletes I think if you just throw it out there for no reason, and also it's just not what we do.

We don't proselytize, and that's kind of a known edict of ours. So we kind of always try to strike that balance between we're not out attention-seeking, but there's a purpose and, you know, a public interest in knowing that this is here kind of thing.

Q. Who writes those press releases?

A. I used to write those press releases, and now press releases can be written by a variety of people. Malcolm sometimes will write drafts of them, and then I'll look them over. He works with an assistant Rachel who also writes

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that was probably around 2017.

Q. Do you have a sense of how many press releases you issue every year?

A. No, but I would say under 12. Certainly under one a month. Not as many as that. Maybe I'm thinking really low, because maybe I just don't realize it, but my estimate would be around three a year.

Q. Three a year?

A. I would think so.

Q. So we have here maybe 30 press releases it appears from 51 through 80. So is it your testimony then that these press releases would reflect all the press releases issued in the last ten years?

A. I'm not sure, you know. Maybe, maybe not. We may have gone through stretches where we released a lot more press releases than I realized especially if we were releasing multiple press releases for the same issue, but so, you know, in that respect it might be a lot more press releases. I'm just thinking of instances I guess in which a press release is appropriate anyway.

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Q. Who do you send the press releases to?

A. Right now we send them to a woman named Karen, and as far as I know, she just sends them to media outlets, and, you know, they'll request an interview or not.

Q. Do you know how large her mailing list is?

A. No, I have no idea, and in my experience people who work that job just have a mailing list, and they hold it tightly, because that's what their whole credibility is based on.

Q. Is Karen, the woman you just referred to, is that Karen Campbell?

A. Yes.

MR. STRACHER: Let's mark this as Exhibit 25 and then Exhibit 26.

(Defendant's Exhibit 25, Document Bates stamped TST 37, TST 38, TST 39, TST 40 and TST 44, was so marked for identification, as of this date.)

(Defendant's Exhibit 26, Document Bates stamped TST 41, TST 42, TST 43 and TST 45, was so marked for identification,

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intuitively have a better understanding of what it might mean to be a Satanist with affirmative values.

They also see traditional religious organizations denigrating and outcasting gay people, trans people and that kind of thing, and we are inclusive in a way that traditional religions aren't, and in that way we really built a space for people who felt alienated from traditional religions and are really happy to have found a sense of community amongst people who maybe all feel outcasts from traditional religions, and they never thought they would have religious community.

So I think that's what it is right now. I think partially culture wars, certainly the political polarization, but also a desire to actually stand outside of that, but I don't really think we're a real culture war force. I think we're more of a mitigating force at least in the best case scenario.

Q. Your advocacy I assume has also helped gotten you attention and brought more awareness of your positions. Would you agree?

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A. Well, our advocacy certainly helps people understand what we're advocating for. Yeah.

Q. Right. Your litigation, some of the positions you've taken in litigation, has certainly increased public awareness of the temple. Wouldn't you agree?

A. Sure. Yeah. We're dependent on people knowing what we're doing. You know, this can't survive without a donation base kind of thing, and, you know, toward that end we need people who might agree with what we're doing to know what we're doing in order to sustain those activities.

Q. Advocacy breeds advocacy, right? The more you advocate, the more your positions are likely to be known and draw others to those positions, right?

A. Well, the more you take concrete action the more people kind of rely on you to act in the interests of those positions you're taking. I mean our position is always that we want to, we want to comment when we have a plan, you know. We want to be engaged publicly when we

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what he thought he wanted to talk about, but he cut it off really early, and it was supposed to be like up to a ten-minute interview. I think after two minutes he said thanks for coming on without really going anywhere with it. He didn't want to talk about the after-school Satan clubs.

Q. Have you done other national television interviews?

A. Yes. I've done Fox radio interviews. I've done a lot of syndicated radio more than I could enumerate for you here. I've done, I did the Chris Hayes show on MSNBC a long time back. There were also, you know, there's kind of a gray area now as to what's even television broadcast, because the Huffington Post at least used to have a streaming video news show that I was on a few times before anybody really knew they were just a Russian propaganda front even though it was Russia Today.

I was on RT a few times, two or three times, something like that, and I might be missing some. There's the local broadcasts I'm on often when say the after-school Satan clubs come to a local area, and the local newscasters

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want to talk to somebody. I've done a lot of those too.

Q. How many after-school Satan clubs do you have?

A. Shit. Sorry. I'm not sure on that. It all -- I could give you a wildly inaccurate number, if I take a guess.

Q. More than a dozen?

A. I don't think, no. I'm pretty sure there's not more than a dozen. It's not going to be a terribly large number. It's a battle every time.

Q. And how many newspaper interviews, national newspaper interviews, have you done, if you know?

A. I don't know. I've done a lot of that. I've done a lot of that. I think I would really like to know what the number is, because I've stopped thinking too much about that kind of thing anymore. I've done a lot of podcast interviews and things like that, and I have certainly lost track.

Q. What is Satancon?

A. That's supposed to be our annual

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that they would be, but the rationale should be there as well.

Q. Was there any investigation into claims that Jex had been sexually harassed?

A. Not that I'm aware of, but I'm also not aware that she ever actually made a complaint or gave us anything to actually investigate.

Q. After the Medium article came out, were there any investigations into her claims that she had been sexually harassed?

A. Well, I take issue with the idea that she made an actual claim within the Medium article. She made a statement claiming that there were these circumstances giving very little to work off and also under circumstances where we knew that she had been lying about essentially everything else in the Medium article, that I don't think we viewed these claims of hers as actionable on our end.

Q. So the answer is no, there was no investigation after the Medium article came out?

A. Not that I'm aware of, but nor do I know what form that could take with such little